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8 *Proposed Liaison Counsel*
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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 MAINE STATE RETIREMENT
13 SYSTEM, Individually and On Behalf
14 of All Others Similarly Situated,

15 Plaintiff,

16 v.

17 COUNTRYWIDE FINANCIAL
18 CORPORATION, a Delaware
19 corporation; COUNTRYWIDE HOME
20 LOANS, INC.; CWALT, INC., a
21 Delaware corporation; CWMBBS, INC.,
22 a Delaware corporation; CWABS,
23 INC., a Delaware corporation;
24 CWHEQ, INC., a Delaware
25 corporation; COUNTRYWIDE
26 CAPITAL MARKETS;
27 COUNTRYWIDE SECURITIES
28 CORPORATION; J.P. MORGAN
SECURITIES INC.; DEUTSCHE
BANK SECURITIES INC.; BEAR,
STEARNS & CO., INC.; BANC OF
AMERICA SECURITIES LLC; UBS
SECURITIES, LLC; MORGAN
STANLEY & CO. INCORPORATED;
EDWARD D. JONES & CO., L.P.;
CITIGROUP GLOBAL MARKETS
INC.; GOLDMAN, SACHS & CO.;
CREDIT SUISSE SECURITIES
(USA) LLC; GREENWICH CAPITAL
MARKETS, INC. A.K.A. RBS
GREENWICH CAPITAL;

No. 2:10-CV-00302 MRP (MAN)

CLASS ACTION

**DECLARATION OF MICHAEL
GOLDBERG IN SUPPORT OF
MOTION OF THE IOWA PUBLIC
EMPLOYEES' RETIREMENT
SYSTEM FOR APPOINTMENT AS
LEAD PLAINTIFF AND APPROVAL
OF LEAD PLAINTIFF'S
SELECTION OF LEAD COUNSEL**

Hon. Mariana R. Pfaelzer
Date: May 3, 2010
Time: 11:00 a.m.
Ctvm: 12

1 BARCLAYS CAPITAL INC.; HSBC
 2 SECURITIES (USA); BNP PARIBAS
 3 SECURITIES CORP.; MERRILL
 4 LYNCH, PIERCE, FENNER &
 5 SMITH, INCORPORATED;
 6 STANFORD L. KURLAND; DAVID
 7 A. SPECTOR; ERIC P. SIERACKI; N.
 8 JOSHUA ADLER; RANJIT
 9 KRIPALANI; JENNIFER S.
 10 SANDEFUR; DAVID A. SAMBOL,
 11
 12 Defendants.

13 I, Michael Goldberg, hereby declare as follows:

14 1. I am a partner of Glancy Binkow & Goldberg LLP, proposed Liaison
 15 Counsel for the Class. I make this declaration in support of the motion of Iowa
 16 Public Employees' Retirement System ("IPERS" or "Movant") for appointment as
 17 Lead Plaintiff and approval of its selection of Lead Counsel in the above-captioned
 18 action (the "Action"). I have personal knowledge of the matters stated herein and,
 19 if called upon, I could and would competently testify thereto.

20 2. Attached are true and correct copies of the following exhibits:

21 Exhibit A: Press release published on February 1, 2010, on
 22 *BusinessWire*, announcing pendency of the Action;

23 Exhibit B: Certification of Movant;

24 Exhibit C: Firm résumé of Cohen Milstein Sellers & Toll PLLC;

25 Exhibit D: Firm résumé of Glancy Binkow & Goldberg LLP.

26 3. Cohen Milstein is currently serving as lead or co-lead counsel in
 27 multiple securities class actions which involve issuance of asset-backed securities,
 28 including:

In re Dynex Capital, Inc. Sec. Litig., No. 05-cv-1897-HB (S.D.N.Y.) (lead
 counsel for the putative class);

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2 *New Jersey Carpenters Vacation Fund v. Royal Bank of Scotland Group,*
3 PLC, No. 08-cv-5093-HB (S.D.N.Y.) (lead counsel for the putative class);

4 *New Jersey Carpenters Health Fund v. NovaStar Mortgage, Inc.,* No. 08-cv-
5 5310-DAB (S.D.N.Y.) (lead counsel for the putative class);

6 *New Jersey Carpenters Health Fund v. DLJ Mortgage Capital, Inc.,* No. 08-
7 cv-5653-PAC (S.D.N.Y.) (lead counsel for the putative class);

8 *In re Lehman Bros. Mortgage-Backed Sec. Litig.,* Nos. 09-md-2017-LAK,
9 08-cv-6762-LAK (S.D.N.Y.) (lead counsel for the putative class);

10 *In re Bear Stearns Mortgage Pass-Through Certificates Sec. Litig.,* No. 08-
11 cv-8093-LTS (S.D.N.Y.) (co-lead counsel for the putative class);

12 *New Jersey Carpenters Health Fund v. Residential Capital, LLC,* No. 08-cv-
13 8781-HB (S.D.N.Y.) (lead counsel for the putative class);

14 *Doral Bank Puerto Rico v. WaMu Asset Acceptance Corp.,* No. C09-
15 1557MJP (W.D. Wash.) (lead counsel on 13 Offerings on the WaMu 2007
Registration Statement).

16 I declare under penalty of perjury under the laws of the United States of
17 America that the foregoing facts are true and correct.

18 Executed this 2nd day of April, 2010, at Los Angeles, California.

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20
21 /s/ Michael Goldberg
22 Michael Goldberg
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**PROOF OF SERVICE VIA ELECTRONIC POSTING PURSUANT TO
CENTRAL DISTRICT OF CALIFORNIA LOCAL RULES
AND ECF GENERAL ORDER NO. 08-02**

I, the undersigned, say:

I am a citizen of the United States and am employed in the office of a member of the Bar of this Court. I am over the age of 18 and not a party to the within action. My business address is 1801 Avenue of the Stars, Suite 311, Los Angeles, California 90067.

On April 2, 2010, I caused to be served the following documents:

- 1. NOTICE OF MOTION AND MOTION OF THE IOWA PUBLIC EMPLOYEES' RETIREMENT SYSTEM FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL**
- 2. MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION OF THE IOWA PUBLIC EMPLOYEES' RETIREMENT SYSTEM FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL**
- 3. DECLARATION OF MICHAEL GOLDBERG IN SUPPORT OF MOTION OF THE IOWA PUBLIC EMPLOYEES' RETIREMENT SYSTEM FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL**
- 4. [PROPOSED] ORDER**

By posting these documents to the ECF Website of the United States District Court for the Central District of California, for receipt electronically by the following parties:

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10 Andrew L Zivitz
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11 There are no non-ECF registered parties in this action.

12 I certify under penalty of perjury under the laws of the United States of
13 America that the foregoing is true and correct. Executed on April 2, 2010, at Los
14 Angeles, California.

15 *s/Michael Goldberg*
Michael Goldberg